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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

December 17, 1997

BY HAND DELIVERY

Magalie Salas, Esquire
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

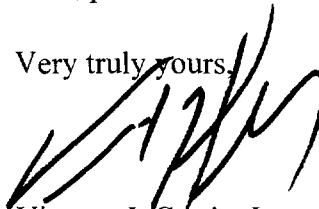
Re: Advanced Television Systems and Their Impact Upon the
Existing Television Broadcast Service (MM Docket 87-268)

Dear Ms. Salas:

Transmitted herewith, on behalf of Communications Corporation of America, are an original and four copies of their "Supplemental Comments" in the above-referenced proceeding.

Should any questions arise concerning this matter, please communicate with this office.

Very truly yours,



Vincent J. Curtis, Jr.

VJC:mah
Enclosure

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ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Advanced Television Systems) MM Docket No. 87-268
and Their Impact Upon the Existing)
Television Broadcast Service)

Directed To: The Commission

**SUPPLEMENTAL COMMENTS OF
COMMUNICATIONS CORPORATION OF AMERICA¹**

Comes now Communications Corporation of America ("CCA"), through counsel, and submits these supplemental comments in connection with the above-captioned proceeding.² In support, the following is stated:

1. By Public Notice released December 2, 1997, the Chief, Office of Engineering and Technology invited supplemental comments to be directed to the recent filings by the Association for Maximum Service Broadcasters, Inc. (MSTV) and the Association of Local Television Stations, Inc. (ALTV) suggesting certain changes in the Fifth and Sixth Reports and Orders, in the proceeding (FCC 97-116 and FCC 97-115, respectively). To the extent that the MSTV Ex Parte Submission

¹Communications Corporation of America, through various subsidiaries, owns and operates Stations WGMB-TV, Baton Rouge, KMSS-TV, Shreveport, both Louisiana; KPEJ-TV, Odessa; KWKT-TV, Waco; KVEO-TV, Brownsville; KYLE-TV, Bryan and KTSM-TV, El Paso, all Texas. Except for El Paso, all of these are UHF facilities.

²CCA is also co-signing the simultaneous filing in this proceeding by a coalition of UHF broadcasters under the auspices of Viacom, Inc., which supports increased power levels for UHF facilities.

seeks to correct obvious shortcomings in the Commission's DTV Table of Allotments, CCA applauds and supports such positions.³ CCA, however, does not believe that the submission goes far enough to deal with the major problem of VHF/UHF power discrepancies.

2. Similarly, the ALTV proposal for use of tilt beam antennas is certainly helpful. Here again, however, this proposal will have a limited benefit.⁴

3. The fact is that there is a substantial disparity between the power levels authorized to UHF and VHF stations. This discrepancy essentially limits UHF facilities to secondary citizenship in the competitive world. The solution, as set forth in the UHF Broadcasters Coalition Comments being filed simultaneously, is to raise the floor of the power level of UHF stations to 200 kw, while limiting the ceiling of VHF stations to 1,000 kw.⁵ Without this change, CCA believes that the Commission will not only cause substantial damage to UHF DTV stations in competition with their VHF counterparts, but also that there will be a corresponding impact on DTV roll-out because of poor reception due to the lack of sufficient power.

³For example, MSTV suggested changes involving CCA's Station WGMB-TV, Baton Rouge, Louisiana, which will substantially improve its coverage area. See MSTV Ex Parte Submission at Exhibit 1-A.

⁴The suggestion by ALTV that upon receipt of a complaint claiming interference, a reduction of power must immediately take place is vague. Reduced to what power? Perhaps to a power no less than originally proposed by the Commission.

⁵The UHF Broadcasters Coalition Comments recognize that there may be exceptions to the proposal because of interference concerns, but they should be small in number.

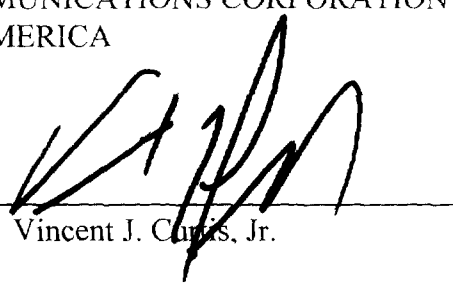
Conclusion

WHEREFORE, the Premises Considered, CCA respectfully submits these Supplemental Comments and urges the Commission to make the power level changes requested herein.

Respectfully submitted,

COMMUNICATIONS CORPORATION
OF AMERICA

By: _____


Vincent J. Curtis, Jr.

Its Attorney

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December 17, 1997

CERTIFICATE OF SERVICE

I, Mary A. Haller, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C., do hereby certify that true copies of the foregoing "Supplemental Comments of Communications Corporation of America" were sent this 17th day of December, 1997, by United States mail, postage prepaid, to the following:

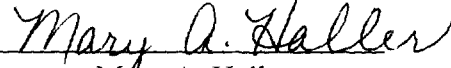
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